

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

vs.

STEFAN QIN, VIRGIL TECHNOLOGIES
LLC, MONTGOMERY TECHNOLOGIES
LLC, VIRGIL QUANTITATIVE
RESEARCH, LLC, VIRGIL CAPITAL LLC,
and VQR PARTNERS LLC,

Defendants.

Case No.: 20-cv-10849 (LGS)

**NOTICE OF RECEIVER'S MOTION FOR AN ORDER APPROVING THE
RETENTION OF NELSONS ATTORNEYS-AT-LAW, LTD**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Bari R. Nadworny with all exhibits annexed thereto, and upon all the prior pleadings and proceedings herein, Robert A. Musiala, Jr., the Court-appointed Receiver in the above-captioned case (the “Receiver”), by and through his counsel, moves this Court, before the Honorable Lorna G. Schofield, United States District Judge for the Southern District of New York, at the United States District Court for the Southern District of New York, 40 Foley Square, New York, New York 10007, for an order granting the Receiver’s motion for approval to retain Nelsons Attorneys-at-Law, Ltd (“Nelsons”) as special counsel, together with such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that this Motion is made with the consent of Plaintiff. The Receiver respectfully requests that this Motion be decided on an expedited basis.

Dated: February 16, 2021
New York, New York

BAKER & HOSTETLER LLP

/s/ Bari R. Nadworny
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